

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIFTH SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-5-1 With reference to Attachment BE-1-1B, it appears that this map was created for purposes of a subdivision plan where approval was not required. Please confirm this fact and explain why approval was not required for this subdivision plan.

Response: **Approval is not required because it is technically not a subdivision within the meaning of the Massachusetts Subdivision Control Law, M.G.L. Chapter 41, Sections 81K to 81GG.**

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BE-5-2 With reference to Attachment BE-1-5B, under Note 3 there is the following statement: "All electrical power ductbanks and manholes shall be built to [Wellesley Municipal Light Plant ("WMLP")] standards." Please explain whether the ductbanks and manholes are being (or have been) constructed in accordance with WMLP standards and why, and please provide a copy of the WMLP standards under which Olin College ("Olin") is constructing the electric facilities, including but not limited to, ductbanks and manholes, on its campus.

Response: **See response to BE-3-20. As stated therein, the work shown on those plans has not even been bid, let alone constructed.**

Olin has not used WMLP standards for the electric facilities that have been constructed on the Olin campus.

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BE-5-3 With reference to Attachment BE-1-5C, please define the term “early site package” as it is used on that map. Please also indicate, and provide all supporting documentation regarding when the “early site package” was installed, what property it was installed upon (Olin, Babson College (“Babson”), etc.), and the cost of such installation.

Response: See Attachment BE-5-3. The early site package was installed in late 1999 and early 2000.

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BE-5-4 With reference to the response to Information Request BE-1-6, please indicate, and provide all supporting documentation regarding, on what date Olin was granted tax-exempt status and the reason for the exemption.

Response: See Attachment BE-5-4.

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Witness Responsible: Stephen Hannabury

BE-5-5 With reference to Attachment BE-1-7A and the April 13, 2001 email from Shelley Kaplan to John Eldert that references a "Board vote," please provide all minutes of any and all meetings of the Board of Trustees of Babson or the Board of Trustees of Olin where action was taken regarding electrical interconnection or other electricity matters concerning either or both of the colleges. Please provide copies of any materials distributed to either Board in support of any such votes and/or Board meetings.

Response: **The Olin College Board of Trustees has not taken any actions concerning electrical service.**

Olin does not have access to Babson College Board of Trustee materials.

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BE-5-6 With reference to Attachment BE-1-7A and the May 2, 2001 email from Stephen Hannabury to Shelley Kaplan, please provide a copy of the "firm written commitment" from WMLP referenced therein. If there is no such "firm written commitment," explain why not and what kind of commitment Olin and/or Babson currently has from WMLP regarding electric service.

Response: **No written commitment was ultimately requested or received. Satisfactory verbal commitments to Olin were made by WMLP.**

Olin has no knowledge of any commitments from WMLP to Babson College.

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BE-5-7 With reference to Attachment BE-1-7A and the June 19, 2001 email from Shelley Kaplan to Stephen Hannabury, and the statement, “[w]e all did agree early on that we need to keep the cable run in Wellesley all the way to the meter location,” please explain who made this decision and the reason for this decision, providing any supporting documents. Also, please identify the “meter location.”

Response: **Olin College made the decision to keep all conduit and cable in Wellesley. The meter location will be on the Olin College property in Wellesley. There is no documentation.**

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BE-5-8 With reference to Attachment BE-1-7A and the June 20, 2001 email from Shelley Kaplan to Stephen Hannabury referencing "legal issues," please identify the legal issues raised and provide any supporting documentation, including minutes from the meeting where these "legal issues" were identified.

Response: **The legal issues referenced in this email include the legal issues discussed in this proceeding to date. All supporting documentation has been submitted in response to previous requests.**

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Witness Responsible: Stephen Hannabury

BE-5-9 With reference to Attachment BE-1-8A and the September 29, 1999 email from James O'Grady to Lawrence Milas in which appears the statement "[t]he important distinction is that Olin must be a sub meter to Babson," please define the term "sub meter." Also, please explain why it is an "important distinction" that Olin is a "sub meter" customer to Babson (as opposed to being directly served by WMLP). Please identify and describe any metering or submetering that Babson has conducted with regard to Olin, including any bills or other statements of usage. Please provide all information, memorandum, correspondence and other documentation that supports the conclusion that Babson's submetering of Olin is an important distinction.

Response: **This statement was made in the context of an early conceptual discussion of how the provision of electric service from WMLP might occur. In due course, the sub-metering option was discarded. Note, however, that the discussion of potential shared switchgear remains a matter of consideration by Olin and Babson.**

Please see Attachment BE-3-3 for temporary power metering information and Olin's Response to BE-3-8 regarding the absence of bills by Babson to Olin for electric usage.

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BE-5-10 With reference to Attachment BE-1-8A, there is an electricity cost analysis dated October 27, 2000, which is an update to an original analysis dated November 19, 1999, conducted by LaCapra Associates. In this 2000 analysis, please explain what is being updated. Also, please explain the Power Options alternative and whether the Power Options alternative would be available if Olin took service from: (a) Boston Edison; or (b) WMLP. Please provide a copy of all documentation relating to the Power Options alternative.

Response: **The October 27, 2000 update was prepared by Stephen Hannabury to include the Power Options figures. The Power Options figures are based on estimated rates that were verbally provided to Olin. All other figures should be the same as the original LaCapra Associates analysis.**

It is Olin's understanding that, at this point in time, Power Options would only be an option if NSTAR provided distribution services.

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BE-5-11 With reference to Attachment BE-1-8A and the August 15, 2001 letter from Shooshanian Engineering, Inc. to Gary Babin of WMLP, and the statement contained therein reading, "[t]he request for temporary service will be addressed under a separate letter from Babson and Olin Colleges directly," please provide copies of any and all requests for temporary service from WMLP made by Babson and/or Olin. Please describe and provide a copy of WMLP's response to any such requests.

Response: Olin has not made such a request.

Olin has no knowledge of whether Babson made such a request but it seems unlikely that they would since they do not need temporary power.

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BE-5-12 Please refer to Response to Information Request BE-2-7, Exhibit 3, including the Shooshanian Meeting Minutes from a January 7, 2002 meeting, and the statement that "specified S & C switchgear does not meet NSTAR (Boston Edison) requirements. If for some reason [WMLP] can not serve Olin College, then specified S & C switchgear will have to be replaced." With reference to that statement, please describe what the "S & C switchgear" is and where it is intended to be used (or where it is currently being used). Please also include whether such switchgear has been purchased, delivered and installed. If it has not yet been installed, please specify when such installation is planned. Please also identify the cost of purchasing such switchgear and the cost of any actual or planned installation.

Response: The S & C switchgear would be placed on the Olin owned property in Needham.

As stated many times previously, no work has been done to construct or purchase permanent facilities to connect to WMLP. In this particular instance, Olin has not even obtained purchase or installation bids for the switchgear.

The statement in the meeting minutes was made in the course of a hypothetical discussion about Olin purchasing the switchgear before obtaining the requested Department approval.

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BE-5-13 Regarding any meetings held between any combination of Babson, Olin and WMLP since January 1, 2002, please describe when such meetings have been held, and specify the attendees and provide the agendas of any such meetings. Also, provide the minutes of all such meetings or, if no minutes are available, a summary of the topics discussed. Also include any materials distributed or referenced at such meetings.

Response: See response to BE-3-9